



U.S. Department of the Interior
Bureau of Land Management

House on Fire Trailhead Improvements

Monticello Field Office

September 2021



Mission Statement

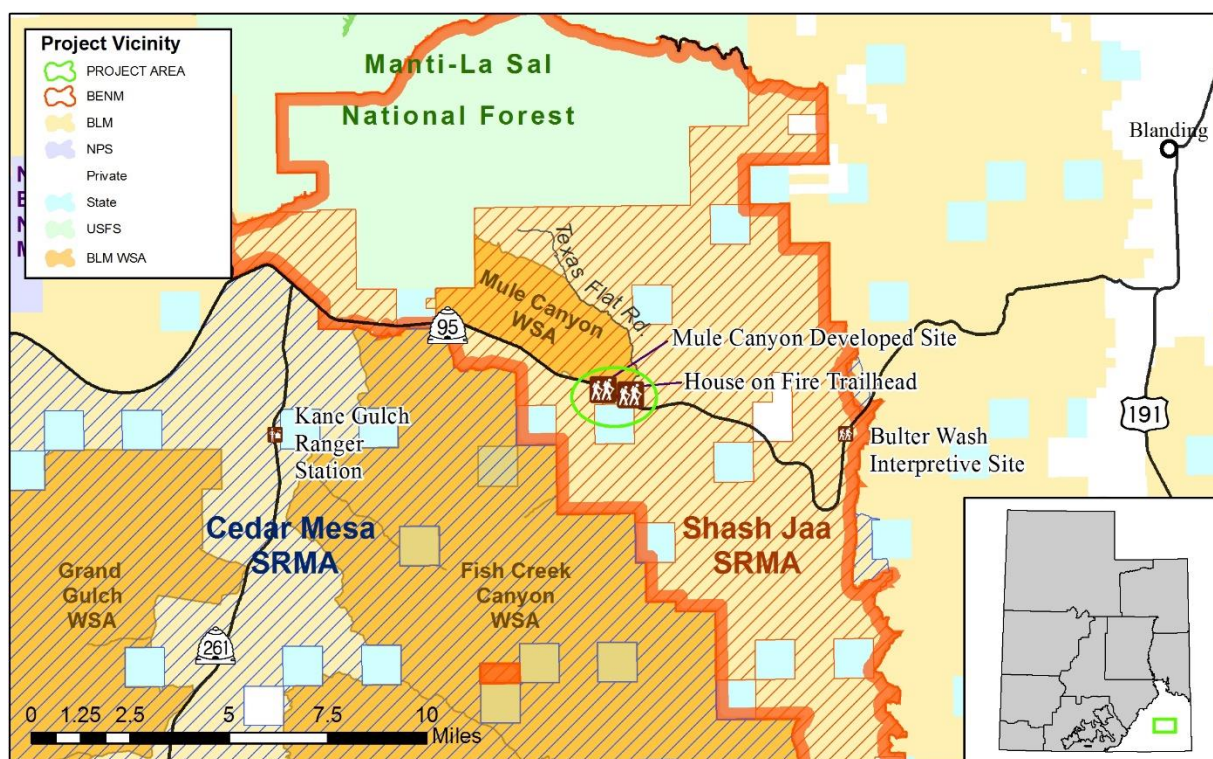
To sustain the health, diversity, and productivity of the public lands
for the use and enjoyment of present and future generations.

DOI-BLM-UT-Y020-2020-0023-EA

1.0 INTRODUCTION

House on Fire is an ancestral Puebloan granary located approximately 1.1 miles up the South Fork of Mule Canyon in the Shash Jaa Special Recreation Management Area (SRMA) of Bears Ears National Monument (BENM). An existing trail to the site can be reached from the Texas Flat Road, which crosses Mule Canyon just north of State Route (SR) 95. The trail and site are located within the Mule Canyon Wilderness Study Area (WSA). Based on its accessibility and photographic quality, House on Fire is one of the most popular sites on Cedar Mesa and in the BENM. The Bureau of Land Management (BLM) Monticello Field Office (MFO) is proposing to develop a parking area and trailhead near the mouth of Mule Canyon in the Trail of the Ancients Recreation Management Zone (RMZ) to help manage increased recreational use in this area. In addition to the parking area and trailhead, the BLM is proposing to construct a new trail that will connect the House on Fire Trailhead with the Mule Canyon Developed Site.

Map 1: Project area, land management status, SRMAs and WSAs within the vicinity of the Proposed Action



1.1. Purpose and Need

House on Fire, located in the South Fork of Mule Canyon, is one of the most popular sites in the BENM, but the current infrastructure is insufficient for the increasing visitor demand. A bulletin board located within the WSA and a fee tube on the Texas Flat Road are the only constructed facilities at the site. Vehicles are encouraged to park in a disturbed area at the top of the hill to the west of Mule Canyon near an existing fee tube; however, the majority of visitors parallel park in undesignated areas along the Texas Flat Road where it crosses Mule Canyon. Parking on the road

creates traffic congestion and safety hazards as visitors and cars use the same narrow causeway over the South Fork of Mule Canyon to access the trail. Increased visitation has resulted in several documented incidents of damage to the site, likely caused by visitors with insufficient education about proper etiquette practices at sensitive cultural sites. Increased visitation also creates concerns about by food waste being left at the site or human waste being left along the trail. Due to unclear signage, some individuals are also accessing the site from the Mule Canyon Village Site which has created a network of unauthorized social trails in the Mule Canyon WSA.

The purpose of the Proposed Action is to develop a formal parking area and trailhead for House on Fire with associated facilities to help make it easy for visitors get the most out their stay while acting in a responsible and non-destructive manner. Construction of these facilities would reduce issues created by roadside parking and consolidate the trailhead, fee area, and interpretive and educational information in one location. Construction of a toilet and parking area will encourage those uses to be contained at the parking area, rather than occurring in an uncontrolled manner along the trail or even at the site. Educating of visitors through better and more obvious signage will allow BLM to convey messages about best practices for respectfully visiting the site, thereby reducing chances for inadvertent harm to House on Fire. Construction of a connector trail will reduce or eliminate the number of social/user created trails between the Mule Canyon Developed Site and House on Fire and create an attractive foot accessible option between these two archaeological sites.

The decision to be made is whether BLM will build the parking area and trail as proposed.

1.2. Scoping and Issues

Internal scoping for this project was conducted by an interdisciplinary team of resource specialists in the BLM MFO. The team evaluated potential impacts of the Proposed Action on public land resources in the surrounding area. An interdisciplinary team checklist, which includes documentation of the BLM's internal scoping efforts, is included as Appendix A.

Public scoping for this project was conducted via a formal public comment period on the ePlanning website from May 4, 2020 to June 4, 2020. Nine comments covering a range of issues were received from the public. Two expressed support of the project. Two were generally supportive but highlighted specific concerns about potential impacts of the connector trail and a proposed loop trail within the Mule Canyon WSA and cultural sites other than House on Fire. One was generally supportive and emphasized the connector and loop trails as essential to the success of the proposal. Three emphasized the importance of better signage to educate visitors on appropriate cultural site visitation. One proposed an alternative to create an OHV (off highway vehicle) trail between Texas Flat Road and a nearby State of Utah School and Institutional Trust Land Administration section. One expressed disapproval of the project and concern that the construction would draw more visitors. A summary of the comments, broken out by subject, is included as Appendix C.

During scoping, the BLM determined that the following issues should be analyzed in detail.

- *Issue 1: How would constructing the proposed parking area, trailhead, and trail affect the recreational opportunities or experiences of visitors?*

- *Issue 2: How would the proposed trailhead affect the viewshed from SR 95 (Trail of the Ancients Scenic Byway) and does the proposed trailhead conform to Visual Resource Management (VRM) objectives for the area?*
- *Issue 3: How would construction of the new connector trail affect the wilderness values of the Mule Canyon WSA?*

2.0 ALTERNATIVES

2.1. Alternative 1 – No Action Alternative

BLM would not construct the proposed parking area, trailhead, or hiking trails.

2.2. Alternative 2 – Proposed Action

The BLM is proposing to construct a parking area and trailhead for the House on Fire trail. The trailhead would be located across the Texas Flat Road from the trail, which would locate the facilities outside of the Mule Canyon WSA and inside the Trail of the Ancients RMZ. Contractors, BLM staff, and/or volunteer labor would be used to perform the work. Construction could occur in multiple phases beginning in fall of 2021 or spring of 2022. Construction of all proposed facilities would result in less than one acre of new surface disturbance. Specifically, the new disturbances would be associated with construction of a parking area, restroom, a new information kiosk and fee tube, and up to five picnic sites. Project-related surface disturbance would generally occur in areas that have already been disturbed.

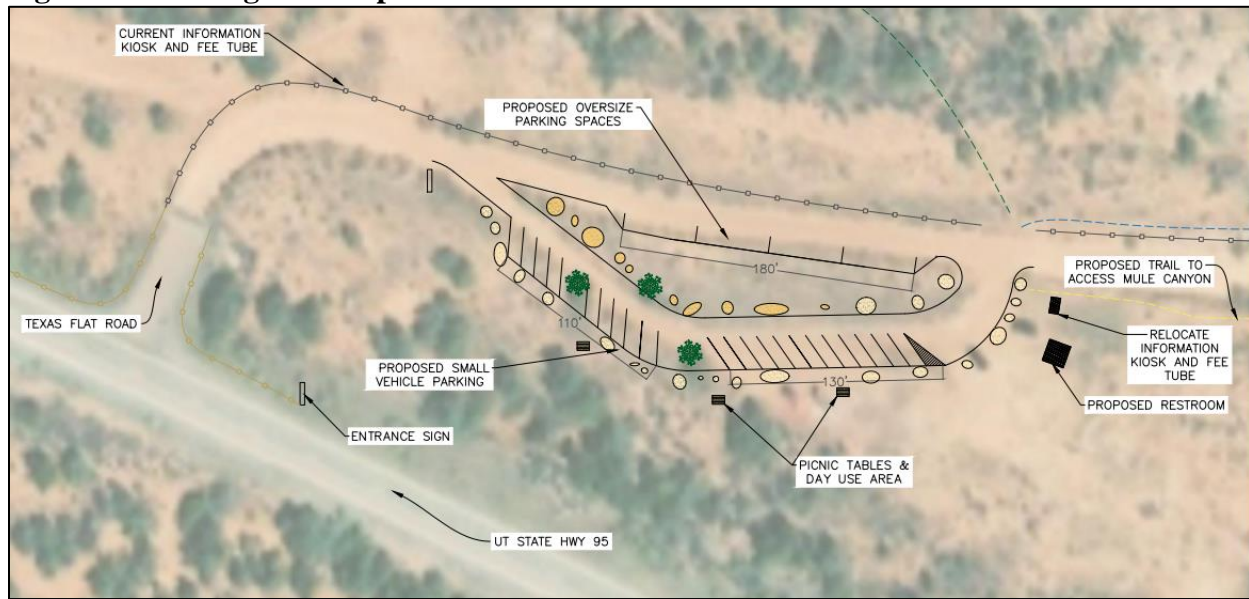
In addition to constructing a new parking area and trailhead, the BLM would construct a short (approximately 0.50 mile) hiking trail from the Mule Canyon Developed Site to the House on Fire trailhead to replace existing social trails/user created routes already connecting these two areas. All other social trails across the area would be remediated using standard methods.

Parking Area and Trailhead Specifics (Figure 1)

- The House on Fire parking area would be constructed in an existing disturbed area where vehicles are currently parking. This area is located at the top of the hill to the west of Mule Canyon near the existing fee tube.
- The parking area would be designed to accommodate 25 standard vehicles and five oversized vehicles.
- The parking area would be surfaced with gravel or other imported material that is similar in color to native material.
- The parking area and trailhead would be fenced or delineated with rock to clearly mark the boundaries and prevent parking lot expansion.
- The trailhead would include a pre-fabricated concrete restroom facility with a vault toilet, which would be maintained by the BLM.
- A new trailhead sign would be installed along SR 95 to direct visitors to the area.

- Approximately five picnic sites would be constructed adjacent to the parking area. Each site would be surfaced with gravel or other imported material and would include a cement or metal picnic table.
- The BLM would remove the existing fee tube and kiosk and install a new fee tube and informational kiosk at a more accessible location.

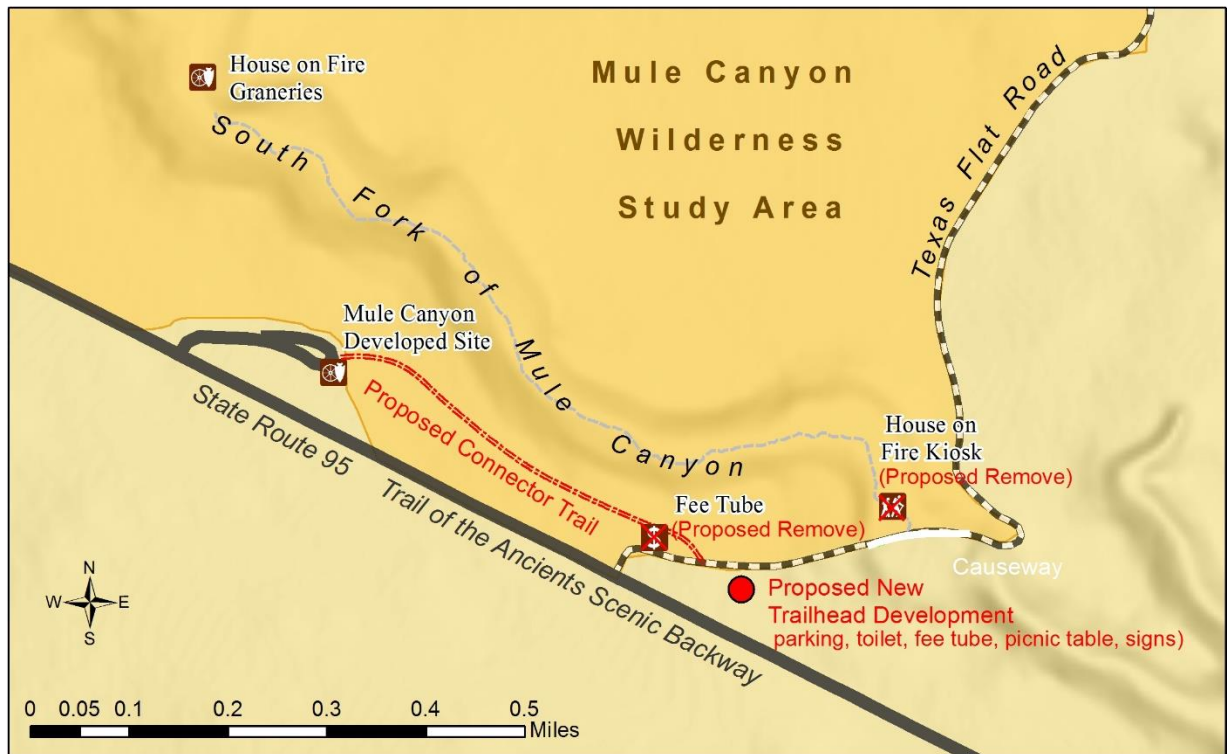
Figure 1: Existing and Proposed facilities at House on Fire Trailhead



Proposed Trails

- An approximately 0.5 mile connector trail (18 inches wide; natural surface) would be constructed from the Mule Canyon Developed Site parking area to the House on Fire Trailhead above the rim of Mule Canyon (Map 2).
- An approximately 0.25 mile hiking trail (18 inches wide; natural surface) would be constructed from the parking area to the existing Mule Canyon trail. A portion of this trail would follow an already-disturbed section of the old SR 95 alignment just east of the proposed trailhead.
- The network of existing social trails would be remediated using a variety of standard techniques which could range from obscuring tread with hand tools or small vegetation to obscure light social trails to vertical mulch or physical barriers (boulders or fencing) for more obvious and well-used social trails. Small wood or carsonite trail markers and signs may be installed in locations where the BLM has determined clarification is needed to eliminate duplicate trails and disturbance to cultural sites, and reduce soil erosion.

Map 2: Proposed Connector Trail Route to the Mule Canyon Developed Site



During construction of the parking area and trailhead, the BLM would not limit access to the South Fork of Mule Canyon. Parking along the Texas Flat Road would continue to be allowed during construction. The construction could occur over several weeks. A variety of heavy, motorized equipment would be used, including but not limited to a dump truck, crane, front-end loader, skid-steer loader, and tractor. Work would occur during daylight hours. Throughout construction, equipment would be parked at the project site or at the Mule Canyon Developed Site. Once construction is completed, general maintenance would be performed on an as-needed basis.

2.2.1. Additional Design Features

In order to reduce resource impacts, the following design features would be required and incorporated into project construction, scheduling and monitoring:

- Proposed trail alignments avoid archeological sites and features, with the exception of the historic SR 95 alignment adjacent to the proposed trailhead. The use of the historic highway is consistent with the historic use and will not impact this archeological resource. An archeologist will monitor social trail remediation activities to avoid unintentional damage to sites on the canyon rim.
- To prevent the spread of invasive and noxious weeds, the equipment used would be washed before transport to the construction site.
- The project site would be monitored for noxious and invasive vegetation after construction. If noxious weeds or non-native, invasive plants are discovered, BLM-

approved weed treatments would be applied in a manner consistent with approved BLM practices.

- Heavy equipment use would be avoided during wet conditions to reduce the compaction of soils.
- Erosion and sediment control structures would be used during construction to contain soil loss due to runoff. Erosion and sediment control structures would remain in place until construction is complete and disturbed areas have been surfaced or revegetated.
- Native plant seeds would be used to re-vegetate areas disturbed during construction and existing disturbed areas.
- The new trail segment would be constructed using hand tools, where needed, to minimize disturbance to the WSA.
- Where possible, existing vegetation between SR 95 and the parking area would be retained to provide visual screening.
- To minimize the visual contrast of the proposed trailhead facilities in the landscape, all facilities would be standard environmental colors, selected by the BLM to repeat the color scheme of the surrounding soils and vegetation.

2.3. Alternatives Considered but Eliminated from Detailed Analysis

The BLM initially considered an alternative which would have created a loop trail between the Mule Canyon developed site and the House on Fire Trailhead in order to consolidate a series of highly erodible social trails leading from House on Fire up the steep slope to the south rim of South Mule Canyon behind the Mule Canyon Developed Site. These user created trails disturb the integrity of the archaeological sites on the rim of Mule Canyon through direct trampling of resources and the introduction of erosion channels in the places that visitors repeatedly walk. The trails also degrade the wilderness characteristic of solitude within the WSA, since visitors at House on Fire experience the sights and sounds of other people in a much more regular and sustained manner when they are scrambling up and down the steep social trail located just below the cliff line directly across the canyon from House on Fire than with brief encounters with other groups walking in the narrow and visually screened trail on the floor of Mule Canyon.

However, internal and external scoping brought up concerns that introducing a designed loop trail could result in disruption of behavior of Mexican spotted owls by increasing the sights and sounds of humans within critical habitat and could increase visitation to less visitor-ready cultural resources in the vicinity of House on Fire by attracting interest in that direction, thus increasing trampling at those sites. The BLM currently has insufficient data to fully analyze the impacts of the loop trail on Mexican spotted owl and cultural resources in the area of House on Fire. In the interest of addressing the public safety and resource protection aspects of the proposed project in a timely fashion, the BLM has determined it will address the impacts to cultural sites on the canyon rim and wilderness characteristics caused by the social trails first by attempting to close the social trails. This will be accomplished using standard techniques such as enhanced signage and physical barriers (see Alternative 2). Instead of a loop trail, the BLM has included in its proposed action a rim trail connecting the Mule Canyon Village site to the House on Fire Trailhead in an effort to

reduce social trails and direct visitor traffic to the appropriate access trail. The Proposed Action, or Alternative B, was therefore modified to remove the loop trail component, and to make closure of social trails, including enhanced signage, more explicit.

Public scoping resulted in an alternative to create an OHV trail paralleling SR 95 between the House on Fire Trailhead and nearby OHV sites. This alternative was eliminated because BLM determined it is outside of scope for this proposal and therefore would not meet the purpose and need.

2.4. Conformance

The Proposed Action is in conformance with the February 2020 *Bears Ears National Monument Record of Decision and Approved Monument Management Plans Indian Creek and Shash Jaa Units*, and is supported by the following plan decisions:

CUL-12 (BLM/USFS) The agencies will allocate the following cultural sites as Public Use (Developed) because they are currently managed as Public Use sites and are currently subject to high visitation:

- Butler Wash Developed Roadside
- **House on Fire**
- Big Kachina Panel
- Mule Canyon Kiva
- Moon House
- Salvation Knoll
- River House
- Doll House
- Butler Wash Panel
- Hole-in-the-Rock Trail/ San Juan Hill
- Arch Canyon Great House complex
- Butler Wash Dinosaur Track Site

REC-7 (BLM/USFS) Development of hiking paths and trails will be allowed if consistent with maintaining Monument objects and values. As part of site-specific implementation-level travel planning, redundant hiking trails and social trails will be closed and reclaimed.

REC-16 (BLM) Shash Jaa SRMA (Note: Decisions apply to all areas within the SRMA except where superseded by specific RMZ and WSA decisions. The following decisions apply to the entire Shash Jaa SRMA.)

- Existing developed recreation sites will be maintained. New sites/facilities/trails will be developed in response to user demand consistent with protecting, preserving, and enhancing Monument objects and values.

REC-18

- Trail of the Ancients RMZ will be managed to facilitate cultural and heritage tourism.

VRM-4 An exception to VRM Class II will be allowed for recreation infrastructure, such as trailheads, campgrounds, contact stations, and toilet facilities, when this infrastructure is consistent with the proper care and management of Monument objects and values. Exception areas will be managed to VRM Class III objectives. The contrast will be allowed only to the extent needed for the function of the facility, which will reflect design excellence and be a positive element for the built environment following existing color, line, form, and texture. Structures will blend into the landscape while retaining functionality.

2.5. Relationship to Statutes, Regulations, Other NEPA Documents

The Proposed Action complies with federal environmental laws and regulations, Executive Orders, and Department of Interior, BLM policies. It is consistent with state laws and local and county ordinances and plans, including the following:

Omnibus Public Land Management Act of 2009

The Omnibus Public Land Management Act (OPLMA) established the National Landscape Conservation System (NLCS) in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations. The NLCS includes National Monuments, Wilderness Study Areas, and Wild and Scenic Rivers. The Act requires the BLM to manage NLCS units in a manner that protects the values for which the components of the system were designated. The proposal was designed to meet the objectives of OPLMA.

The Bears Ears National Monument Proclamation (2016)

The Proposed Action and no action alternative were evaluated for consistency with the Proclamation. The proposed action has been designed to minimize and/or eliminate impacts on objects identified in the Proclamation.

Federal Lands Policy and Management Act of 1976

The Federal Land Policy and Management Act (43 U.S.C. 1701-1712) directs the development of land use plans for BLM lands. Once land use plans are developed, any approved project must be provided in the land use plan or be consistent with the terms, conditions, and decisions in the approved land use plan. As noted above, this project conforms to the land use plan.

National Historic Preservation Act of 1966

Under the National Historic Preservation Act, federal agencies are required to take into account the effects of any undertaking on historic properties included in the National Register of Historic Places or that meet the criteria for inclusion on the National Register. The BLM has conducted cultural resource surveys of the Mule Canyon parking area and trailhead and determined that no eligible properties would be impacted by implementation of the Proposed Action.

BLM Manual 6220 – National Monuments, National Conservation Areas, and Similar Designations (2012)

BLM 6220 requires the agency to “inventory existing facilities within Monuments and NCAs and determine whether to remove, maintain, restore, enhance, or allow natural disintegration of each facility (p. 1-10).” Further, Manual 6220 directs that, “The BLM will only develop new facilities, including structures and roads, within Monuments and NCAs where they are necessary for public health and safety, are required under law, are necessary for the exercise of valid existing rights or

other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated.”

BLM Manual 6330 – Management of Wilderness Study Areas (2012)

New surface disturbing developments, including trails are typically not allowed in WSAs. However, new trail sections may be installed where “hiking or horseback riding use levels have increased, or are expected to increase, to the extent that resource impacts are or are likely to become present (e.g. braided or duplicate trails, impacts to cultural sites or other sensitive resources, or accelerated soil erosion). In these cases, to minimize recreational use impacts to wilderness characteristics a single, properly located, sustainable trail may be provided for under the ‘restoration of impacts from violations emergencies’ or ‘protect or enhance wilderness characteristics or values’ exceptions to the non-impairment criteria.”

Final Guidelines for Outdoor Developed Areas - Published in the Federal Register September 26, 2013. 36 CFR Part 1191 RIN 3014-AA22

The final rule amends the ABA [Architectural Barriers Act] Accessibility Guidelines by adding scoping and technical requirements for camping facilities, picnic facilities, viewing areas, trails, and beach access routes constructed or altered by or on behalf of federal agencies. The final rule ensures that these facilities are readily accessible to and usable by individuals with disabilities.

BLM Guidelines for a Quality Built Environment

The BLM Guidelines for a Quality Built Environment directs BLM to provide facilities that are sustainable, attractive, functional, cost-effective, and responsive to place and setting.

Federal Lands Recreation Enhancement Act of 2004

The Federal Lands Recreation Enhancement Act (FLREA) provides legal criteria for the collection of recreation fees at federal campgrounds or expanded amenity sites. It also directs BLM to provide a specific set of amenities in order to collect fees in campgrounds or special management areas. FLREA also established the America the Beautiful Interagency Pass program.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

This chapter defines the scope of analysis contained in this EA, describes the existing conditions relevant to the issues presented in Table 1 in Section 3.2, and discloses the potential impacts of the Proposed Action and Alternatives.

3.1. Issue 1: *How would constructing the proposed parking area, trailhead, and trail affect the recreational opportunities or experiences of visitors?*

3.1.1. *Affected Environment*

The project is located within the Shash Jáa SRMA. Goals and Objectives for the SRMA include managing recreation to protect human health and safety and developing management actions that are adaptive to recreation trends and changing demands.

House on Fire is located in the South Fork of Mule Canyon, within the boundaries of the Mule Canyon WSA. The site has become a popular subject for photography due to the dramatic alcove

setting and is heavily featured on social media and websites related to Cedar Mesa. The hike to the site is approximately 1.1 miles and follows a well-established easy to moderate natural surface trail. Visitors to House on Fire park along the sides of a narrow causeway that crosses South Mule Canyon or in a small user created dirt parking lot that is often occupied by campers. A fee tube is located in a small disturbed area adjacent to the Texas Flat Road. The fee tube is located approximately 0.2 miles from the trailhead, and requires doubling back toward SR 95 from the typical parking areas. On busy spring and fall days, disorderly parking and fee traffic creates a safety concern as pedestrians and vehicles intermingle on the short stretch of roadway between SR 95 and the causeway. Fee compliance is typically poor.

The Mule Canyon developed recreation site includes a surface pueblo, a restored kiva and interpretive information. This site is accessed directly off SR 95. It is signed and the parking area is on the north side of the highway. The parking area is paved and pit toilet facilities are available. A short, paved walkway leads from the parking area to the site and is wheelchair accessible. The Mule Canyon developed site is adjacent to the WSA. Because Mule Canyon is close to Natural Bridges National Monument, is easily accessible from SR 95, and includes a trail suitable for individuals of all ages and levels of experience, it attracts a wide range of user groups.

3.1.2. *Environmental Impacts*

3.1.2.1. *Methodology*

Estimates of current and future recreation use is based on data collected by the BLM at both the Mule Canyon Developed Site and Mule Canyon trailhead (i.e., House on Fire). According to the BLM's Recreation Management Information System, the number of visitors has varied from year-to-year. Some fluctuations may be attributed to changes or errors in reporting. Visitor information collected by the BLM for the Shash Jaa SRMA over the same time shows a steady increase. Fee compliance information is based on ranger reporting.

Table 1: Recreation Visitation to Mule Canyon Developed Site and House on Fire

Location	Visitors/Year				
	2016	2017	2018	2019	2020
Mule Canyon Developed Site	3,549	3,183	4,562	4,769	4,354
House on Fire Trailhead	3,782	5,699	4,977	6,386	5,112

3.1.2.2. *Impacts of Alternative 1 – No Action Alternative*

Increased visitation to House on Fire would likely continue and issues created by the lack of education and appropriate facilities for parking, toilets, and picnic tables would become more severe. As the number of days per year with high visitation increases, danger to pedestrians, especially children and pets, would rise commensurately as the low visibility caused by tightly packed parallel parked vehicles on the sides of the causeway would happen more often. Vehicles would continue to attempt to turn around on the narrow causeway or would have to drive for several minutes to turn-arounds further down the Texas Flat Road, which might result in increased visitation to sites further afield. Visitors would continue to rely on the one small bulletin board within the WSA for site visitation information, which would limit the BLM's ability to provide

new visitors with adequate information to make responsible decisions about visiting the site, such as education about not touching or leaning on walls, moving structural elements, or attempting to enter the structures. Without appropriate toilet and picnic facilities located at the trailhead, it is likely that increased visitation would result in more incidents of food waste at the site and human waste along the trail. Food waste left at the site increases the likelihood of damage to the site from wildlife brushing against or digging under structures to get to crumbs and wrappers, and both food and human waste reduce the enjoyment of other visitors who encounter such evidence. Because the current configuration of the fee tube and trailhead makes it inconvenient to pay fees without some prior knowledge of the site, fee compliance would remain low, especially among first-time visitors. Visitors would continue to look for alternative entry points into Mule Canyon, resulting in establishment of additional social trails from the Mule Canyon Developed Site. A lack of facilities may deter some individuals from visiting House on Fire and other locations on Cedar Mesa.

3.1.2.3. *Impacts of Alternative 2 – Proposed Action*

Consolidating multiple functions (parking, educational signage, fee collections, toilets, and a picnic area) in one location outside of the WSA and away from House on Fire itself would make it easier for visitors to comply with BLM rules and recommendations to provide for visitor safety and enhance their ability to enjoy protected cultural and natural resources. Construction of a new parking area and trailhead would alleviate parking issues and increase visitor safety by reducing pedestrian and vehicle interaction on the narrow causeway. Visitors seeking a more structured experience would appreciate construction of a new toilet and picnic area adjacent to the parking area, because there are no picnic sites and very few restrooms within the Shash Jáa SRMA. Enhanced signage would increase learning opportunities and safety for those visitors who take advantage of them, and signage that makes the trail location and etiquette information more apparent would help preserve the very resources that visitors seek out at House on Fire. These positive impacts would continue to affect visitors seeking out services and opportunities within BENM throughout the life of the project. Because past data suggests that visitation will only continue to increase, more than 5,000 visitors per year might experience the benefits of the enhanced site over the coming decades.

Most visitors would also embrace construction of a new trail connecting the Mule Canyon Developed Site and House on Fire along the canyon rim. The trail would allow individuals to see both sites as part of one hike and be able to enjoy another perspective of the canyon by following the rim.

The sights and sounds of the heavy machinery, as well as the temporary displacement of parking caused by the construction, would disturb visitors wishing to visit the South Fork of Mule Canyon and House on Fire during the months that the project is being constructed. Timing limitations provided in the design features would limit the number of visitors impacted, as would the temporary nature of the construction.

Construction of new facilities (i.e., parking area, trailhead, toilet, picnic sites, signs, and trail) may negatively affect recreationists that prefer an undeveloped recreational setting. New development and better signage could increase recreational use of Mule Canyon. An increased number of visitors could detract from the recreational experience of those that are looking for a more primitive experience and push them to explore further into the backcountry. Shash Jáa and Cedar Mesa

SRMAs offer an array of remote opportunities which range from trails accessed from long unpaved roads to multi-day backpacking opportunities in WSAs. However, the convenient House on Fire hike would likely become less attractive to these visitors if the site becomes more developed.

3.2. Issue 2: *How would the proposed trailhead affect the viewshed from SR 95 (Trail of the Ancients Scenic Byway) and does the proposed trailhead conform to VRM objectives for the area?*

3.2.1. *Affected Environment*

The affected environment for visual analysis is the viewshed of the proposed trailhead area as seen from the linear Key Observation Point (KOP) of SR 95, the Trail of the Ancients Scenic Byway. The proposed trailhead would be located approximately 150 feet north of the highway. The trailhead would be visible intermittently to highway motorists over an approximately 0.5-mile section of the highway, from a viewing distance of 150 to 2,000 feet. The area has limited topographical variation and is surrounded by mature pinyon pine and juniper woodlands. Canyon features are largely hidden from view. Mesas and the Abajo Mountains are visible in the background viewing distance. The proposed trailhead is predominately located in an area of existing ground disturbance due to undeveloped vehicle parking and camping. There is currently an informational kiosk and signs at the site and a natural surface road (County Road 263, Texas Flat Road) which bends to the northeast, away from the highway. Parked vehicles can frequently be seen in the existing disturbance area.

The BLM uses the VRM system to identify and evaluate an area's scenic values and then determine the appropriate management objectives for those values. A Visual Resource Inventory (VRI) is the process used to identify and evaluate an area's scenic values. A VRI of the Cedar Mesa area was conducted by the BLM MFO in 2012. The proposed trailhead is in an area which was inventoried as VRI Class II, based on a combination of three factors: scenic quality, sensitivity level, and distance zone. For scenic quality, the area received a moderate relative rating of "B" because it consisted of "common visual features". However, it received a high sensitivity level rating due to national public interest, Native American interest, the density of cultural sites, high levels of use (recreation, wood-cutting, grazing), and the presence of WSAs and Scenic Byways and Backways. The adjacent Trail of the Ancients Scenic Byway was federally designated in 2005, based solely on its archaeological qualities. The proposed trailhead would be immediately adjacent to, but not within, the Mule Canyon WSA. The distance zone (distance from which the area is commonly viewed) was inventoried as "foreground-middleground" due to its proximity to SR 95, other frequently traveled routes, and popular recreation sites.

In accordance with the BENM MMP, the area of the proposed trailhead is managed as VRM Class II. The objectives of VRM Class II are to retain the existing character of the landscape. The level of change allowed is low. Activities may be visible but should not attract the attention of the casual observer. However, the BENM MMP provides an exception for, "recreation infrastructure, such as trailheads, campgrounds, contact stations, and toilet facilities, when this infrastructure is consistent with the proper care and management of Monument objects and values. Exception areas will be managed to VRM Class III objectives. The contrast will be allowed only to the extent needed for the function of the facility, which will reflect design excellence and be a positive element for the built environment following existing color, line, form, and texture. Structures will

blend into the landscape while retaining functionality” (VRM-4). The objectives of VRM Class III are to partially retain the existing character of the landscape. The level of change allowed is moderate. Activities may attract attention but should not dominate the view of the casual observer.

3.2.2. *Environmental Impacts*

3.2.2.1. *Methodology*

The BLM uses a systematic process to analyze and predict the amount and degree of visual contrast that is created by a proposed project or activity in the characteristic landscape from specific KOPs. This process is documented in a Visual Contrast Rating Worksheet (Appendix B). To identify visually contrasting elements, the landscape is divided into three major features: land/water, vegetation, and structures. The basic visual elements of form, line, color, and texture are then individually analyzed for each of these features and the degree of contrast is determined. For this project, a KOP was chosen approximately 200 feet from the project area along the 0.5-mile section of SR 95 described in the Affected Environment section (3.2.1). This analysis focuses on the permanent, long-term presence of the facilities. The short-term construction phase is not analyzed in detail because the presence of machinery and equipment would be similar to the effects of parked cars when the project is completed.

3.2.2.2. *Impacts of the Alternative 1 – No Action Alternative*

There would be no new developments that would create visual contrast with the existing character of the landscape. The viewshed, as seen from SR 95 would remain the same. Vehicle parking would continue to be undefined, irregular, and spread out over a wider area. Additional visual impacts could be created by the expansion of parking into undisturbed areas.

3.2.2.3. *Impacts of the Alternative 2 – Proposed Action*

The construction and installation of the proposed trailhead facilities (delineated parking area, restroom facility, information kiosk, and picnic areas) would add some visually contrasting elements to the characteristic landscape, as viewed from SR 95. In determining the degree of effects caused by the proposal from the KOP, the BLM considered several environmental factors: angle of observation, vegetative screening, length of time in view, and relative scale. The proposed trailhead sits in a pocket below the level of the highway and below the horizon line and is partially screened by tall pinyon-juniper vegetation along the roadway. The viewer’s eye is generally drawn to the mesa and mountain forms on the horizon line. Due to the low angle of observation, and vegetative screening, visual contrast produced by the elements of the proposed project are greatly reduced. The length of time the proposed trailhead would be in view from the KOP is limited. With vegetative screening, it would be intermittently visible for approximately 0.4 miles or 22 seconds for a westbound traveler driving at a rate of 65 mph. It would be mostly screened and only visible to an eastbound traveler for approximately 0.1 miles or 6 seconds at the same rate of speed. Finally, the proposed trail is relatively small in scale in a large panoramic landscape, which also reduces the degree of visual impact.

The parking and picnic surface areas would be more clearly defined, and would introduce some additional tan, brown, and gray colors in the foreground of the viewshed. These natural colors are present in the characteristic landscape and therefore the degree of visual contrast would be weak. The restroom, picnic, and information kiosk facilities would introduce more rectangular and angular forms, and vertical and horizontal lines in the foreground of the viewshed. Due to the

irregularity and variability in the characteristic landscape, and the proposed design feature that facilities would be standard environmental colors that repeat the color scheme of the surrounding soils and vegetation, these facilities would not result in more than weak visual contrast in the foreground.

Parked cars would be the most visually impacting element in the viewshed due to their vibrant, unnatural colors and variable forms. However, cars are already parking at the location and are therefore part of the characteristic landscape. Delineated parking would result in more vehicles on the site more often, but visual contrast from vehicles would be more confined, regular, and sited in the area with the most vegetative screening. Vehicles currently park in a scattered, irregular fashion over a greater area, and in areas of higher ground, which can result in more visual contrast from the KOP. Because parking would be more regular and confined to the area of least visual impact, the degree of visual contrast was determined to be weak.

Although the BENM MMP provides an exception that allows recreation infrastructure to be built according to VRM III objectives in this area, the proposed project would conform to VRM II objectives due to the weakness of visual contrast produced by the proposed trailhead elements. The effects of the proposal would not be significant enough to affect the area's overall scenic quality rating from the 2012 VRI. The purpose of the Proposed Action benefits and responds to several factors that contributed to the area's high sensitivity level rating in the 2012 VRI (high levels of recreation use, the presence of cultural sites, WSAs and Scenic Byways). The trailhead would help consolidate parking and limit the impacts of recreation use at the trailhead area, provide cultural site visitation etiquette information to visitors, prevent parking and social trailing in the WSA, and would facilitate visitation of a well-known archaeological site along the Trail of the Ancients Scenic Byway.

3.3. Issue 3: *How would construction of the new connector trail affect the wilderness values of the Mule Canyon WSA?*

3.3.1. *Affected Environment*

The proposed parking area and trailhead is directly adjacent to the 6,171-acre Mule Canyon WSA. The principal features of the WSA are two canyons, the north and south forks of Mule Canyon, typified by alternating bands of red and white sandstone and the presence of a rich variety of cultural resources, including ancestral Puebloan dwellings. The predominant vegetation type is pinyon pine and juniper woodland. Small acreages of sagebrush and riparian vegetation are also present. According to the Utah Statewide Wilderness Study Report (1991), "All of the WSA is in a natural condition and has outstanding opportunities for primitive recreation. About 87 percent of the WSA has outstanding opportunities for solitude. The remaining 13 percent of the WSA does not have outstanding opportunities for solitude due to the nearness of State Highway 95."

3.3.2. *Environmental Impacts*

3.3.2.1. *Impacts of the Alternative 1 – No Action Alternative*

The user created overflow parking and the BLM's fee tube and informational kiosk would remain inside the WSA, which is a slight impact to wilderness characteristics. The increased soil damage and trampling of cultural resources caused by braided social trails would continue to harm the supplemental wilderness characteristics of archeological sites found within the WSA.

3.3.2.2. Impacts of the Alternative 2 – Proposed Action

The proposed parking area and trailhead would be located just outside the Mule Canyon WSA boundary. Currently, user created overflow parking and the BLM's fee tube and informational kiosk are located within the WSA. The BLM would relocate the fee tube and kiosk and fence the new parking area outside of the WSA, which would eliminate these minor intrusions. The braided social trails would be closed, thus reducing further trampling on cultural sites and soil erosion in this area.

Construction of new facilities (i.e., parking area, trailhead, toilet, picnic sites, and trails) could increase recreational use of Mule Canyon. An increased number of visitors could affect opportunities for solitude and primitive and unconfined recreation in the lower end of the South Fork of Mule Canyon. Development of a new connector trail from the Mule Canyon Developed Site to the House on Fire Trailhead could also result in minor new surface disturbance in the WSA.

On-site inventory shows an existing network of user created social trails crossing the canyon rim from the Mule Canyon Developed Site to House on Fire. Therefore, selection of the most appropriate route and consolidation of the trail network into a single constructed trail is appropriate in these circumstances. Development of the proposed connector trail would enhance the wilderness values in portions of the WSA that currently experience route braiding from social trails.

4.0 PUBLIC INVOLVEMENT, CONSULTATION AND COORDINATION

4.1. Public Involvement

Public scoping for this project was conducted via a formal public scoping period on the ePlanning website from May 4, 2020 to June 4, 2020. Nine comments covering a range of issues were received from the public. A summary of the comments, broken out by subject, is included as Appendix C.

4.2. Consultation and Coordination

The BLM, on July 14, 2021, reached out to 32 Tribes to engage in government-to-government consultation. The BLM looks forward to this consultation opportunity to best incorporate tribal nation feedback into this proposed action.

5.0 References

Bears Ears National Monument (BENM) Monument Management Plan (MMP). 2020. Final Environmental Impact Statement (EIS) Shash Jaa and Indian Creek Units. Responsible Agencies: U.S. Department of the Interior, Bureau of Land Management U.S. Department of Agriculture, U.S. Forest Service Document Status.

Bears Ears National Monument (BENM) Proclamation. 2017. Presidential Proclamation Modifying the Bears Ears National Monument. December 4, 2017.

Bureau of Land Management (BLM). 2012. BLM Manual- 6330 – Management of Wilderness Study Areas (Public).

Bureau of Land Management (BLM). 2010. Guidelines for a Quality Built Environment.

APPENDIX A:

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Mule Canyon Trailhead Development

NEPA Log Number: DOI-BLM-UT-Y020-2020-0023-EA

Project Leader: Misti Haines

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

Determi-nation	Resource	Rationale for Determination*	Signature	Date
NI	Air Quality	The Proposed Action is consistent with the Air Quality decisions in the 2008 Monticello RMP. The Proposed Action will result in emissions of fugitive dust from the operation of construction equipment and vehicles on unpaved surfaces; and emissions from the operation of internal combustion engines. These emissions would be sporadic, would rapidly disperse, and are not likely to cause or contribute to a violation of the National Ambient Air Quality Standards therefore air quality does not need to be analyzed in detail in the EA.	T. Marian	06/21/21
NP	Areas of Critical Environmental Concern	There are no ACEC's within the proposed project area.	J. Byrd	06/22/21
NP	BLM Natural Areas	There are no BLM Natural Areas as identified in the 2008 Monticello RMP within the proposed project area.	M. Haines	6/30/21
NI	Cultural Resources	The BLM has completed a Class III archaeological survey of the entire Area of Potential of Effects. The BLM is currently conducting consultation with Tribes, the Utah State Historic Preservation Office, and consulting parties under 36 CFR 800. The BLM will also invite the Advisory Council on Historic Preservation to consult on the project as they have requested to be invited on undertakings implementing the Bears Ears National Monument Management Plan.	J. Lundell	7/27/21
NI	Environmental Justice	There would be no impact to low income or minority communities with the approval of the proposed project because the changes to the trailhead would not have a disproportionate nor adverse impact.	T. Marian	06/21/21
NP	Farmlands (Prime or Unique)	The Monticello Field Office does not include any designated prime and unique farmlands administered by the BLM (MFO PRMP/FEIS, pg 4-7).	J. Carling	06/21/21
NI	Fish and Wildlife Excluding USFW Designated Species	The proposed project area is currently being used as a trailhead and is adjacent to SR 95. The proposed trail sections are existing disturbances from social trail use. Wildlife may temporarily be displaced during times of heavy recreation use or during construction but these impacts would not be significantly different from the current disturbance.	M. Wardle	06/15/21

Determination	Resource	Rationale for Determination*	Signature	Date
		The Proposed Action is within Crucial Mule Deer Winter Range. The short duration of the construction activities is not anticipated to permanently disturb mule deer. To minimize disturbance, no construction would occur from November 15-April 15, unless the wildlife biologist determines that the animals are not present in the project area or that the activity can be completed to not adversely affect the animals.		
NP	Floodplains	The proposal is located in the upland stream terraces and are not situated in any active floodplains. The proposed action does not result in any permanent fills or diversions, or placement of permanent facilities in floodplains or special flood hazard areas. Therefore, floodplains are not present in the immediate footprint of the actions, and there are no secondary affects to a degree that detailed analysis is required.	J. Carling	06/21/21
NI	Fuels/Fire Management	The Proposed Action extends an existing trailhead and establishes a new foot trail. Annual grasses, shrubs and closed canopy Pinyon/Juniper are found in the proposal area. Fuel load will fluctuate in and around these areas from year to year based on precipitation. This action will not affect the likelihood of manmade fire starts as parking is already taking place within the area and fire rings are not proposed for the day use area. The proposal establishes a larger developed parking area which may mitigate accidental vehicle caused ignitions by reducing road side parking. The Proposed Action will not hinder wildland fire response. There are currently no hazardous fuels reduction projects planned for the area.	P. Plemons	06/17/21
NI	Mineral Resources/Energy Production	<p>According to the 2008 Monticello Field Office RMP (Maps 18 & 19), the location for the Proposed Action is closed to both Mineral Disposal and Oil & Gas development. The Proposed Action is located within the Bears Ears National Monument (BENM). Pursuant to the Presidential Proclamation, the BENM is withdrawn from all forms of entry, location, selection, sale, or other disposition under the public land laws. This precludes any future exploration and development of mineral resources in the Monument, with exception of valid existing rights which are not known to occur in proximity of the Proposed Action. Therefore, the Proposed Action would not interfere with mineral development.</p> <p>Proclamation 9558, as modified by Proclamation 9681, withdrew all Federal lands within the BENM from all forms of entry, location, selection, sale, or other disposition under the public land laws or laws applicable to the USFS, from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposed of the Monument. Therefore, no mineral exploration or development would occur within the Proposed Action area that lie within the Monument</p>	R. James	06/24/21

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Invasive Species/Noxious Weeds	There are no known infestations of State of Utah listed noxious weeds in the immediate vicinity of the Proposed Action. Cheatgrass (invasive, non-native) is a minor component of the vegetative community in the area of the proposal. The further development of this existing site should not allow the opportunity for the establishment and propagation of invasive species and noxious weed species. In the unlikely event that noxious weeds establish as a result of activities connected to the Proposed Action, the BLM will actively control these weeds utilizing integrated pest management strategies. For reasons outlined above, there are no impacts to invasive species / noxious weeds to a degree that detailed analysis is required.	N. Noyes	6/24/21
NI	Lands/Access	The proposal would use an existing route and disturbed area. Expansion of the trailhead would have little impact on the lands.	N. Norton	6/29/21
NI	Livestock Grazing	The Proposed Action is located on the Texas Muley allotment along SR 95. The improvement on this trailhead is a minimal disturbance that would not affect vegetation that is utilized by livestock. The Proposed Action is also not in an area where livestock will not be disturbed if the construction occurs when livestock are on the allotment. This action will not have a significant impact on livestock grazing and will not need detailed analysis.	N. Noyes	6/24/21
NI	Migratory Birds.	The proposed project area is currently being used as a primitive trailhead and is adjacent to SR 95. The proposed trail sections are existing disturbances from social trail use also adjacent to SR 95. Most of the disturbance in the PA is bare soil or bedrock, though there would be further clearing of the remaining vegetation. The PA would help reduce encroaching disturbance in the general area by making clear sites for parking and hiking. The Proposed Action may temporarily displace migratory birds during construction but is not expected to be long-term. To protect nesting migratory birds, no construction activities should occur from April 1-July 31, unless clearance surveys are done, and it is determined that there are no nests present.	M. Wardle	06/15/21
NI	Native American Religious Concerns	The BLM is commencing consultation with 32 Tribes.	M. Lundell	6/30/21
NI	Paleontology	The project area is within a PFYC 3 area and is not expected to yield significant fossils. The area also has some previous disturbance. Surveys are required for PFYC 4-5 formations within BENM. Therefore, surveys are not required. A paleontology stipulation would apply. If fossils are encountered during the implementation of the Proposed Action, work will stop, the Monticello Field Office will be contacted within 2 working days and the BLM will provide guidance on how to proceed.	R. James	07/1/21

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Rangeland Health Standards	Currently the Texas Muley allotment is meeting all of the Utah Rangeland Health Standards.	N. Noyes	6/24/21
PI	Recreation	The proposed project is within the Shash Jáa Special Recreation Management Area. The new developments would have a positive impact on recreational users with improved access, enhanced user experience, and an increase in safety of visitors by increasing parking capacity and adding other amenities such as a vault toilet and picnic tables. Users looking for solitude may be negatively impacted by the proposed project.	M. Haines	6/30/21
NI	Socio-Economics	There would be no impact to Socio-Economics with the approval of the proposed project because the project to the trailhead would not generate a substantial amount construction labor related work.	T. Marian	06/21/21
NI	Soils	The project occurs within the 49-Rizno-Rock outcrop, and 45 Rizno-Barx-Yarts complex soil mapping units as described in the Soil Survey of San Juan County, Utah, Central Part. These soils are shallow and well drained with the typical profile of 0 to 5 inches-light reddish brown fine sandy loam; 5 to 19 inches-light reddish brown fine sandy loam; and 19 inches-sandstone bedrock. Much of the Proposed Action occurs within a 3.5-acre area of soils previously disturbed by user created parking areas. This project would not significantly affect overall soil productivity or stability. Soils resource need not be analyzed in detail in the EA.	N. Noyes	6/24/21
NP	Threatened, Endangered or Candidate Plant Species	There are no known Threatened, Endangered or Candidate plant species within the proposed project area. The correct geological formation for Navajo sedge does exist in the area. However, the Proposed Action does not occur near a water source or in the seeps and alcoves that would be suitable habitat for Navajo sedge. Furthermore, the proposed trails could potentially benefit Navajo sedge habitat by directing trail use to designated trails instead of the current use of multiple social trails.	M. Wardle	06/15/21
NP	Threatened, Endangered or Candidate Animal Species	There are no known Threatened, Endangered or Candidate wildlife species within the proposed project area. This PA is located near designated Mexican spotted owl critical habitat. However, the Proposed Action does not occur in suitable habitat for Mexican spotted owl. Past surveys of lower and upper mule canyons have not resulted in owl detections. Suitable habitat typically requires narrow canyons with microclimates for potential nest sites. The lower portion of the canyon near the PA lacks the required habitat for nesting sites.	M. Wardle	06/15/21
NI	Wastes (hazardous or solid)	During the construction phase of the project Standard Operating Procedures (SOPs) would be applied as specified by the RMP in (Appendix G) as appropriate. Toilets would be installed to prevent impacts from human waste. No hazardous wastes would be generated as a result of this project. Wastes will not be analyzed in detail in the EA.	N. Noyes	6/24/21

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Water Resources/Quality (drinking/surface/ground)	The proposed trail head for Mule Canyon is not near any intermittent streams. Appropriate erosion controls would be taken during the construction or the proposed facilities. Toilets would be installed in a closed system therefore there will be no impacts from human waste to water quality.	M. Wardle	06/15/21
NP	Wetlands/Riparian Zones	The proposed sites of the trailhead and new foot trail are in the uplands and lack appreciable surface and/or sub-surface waters for the establishment and maintenance of wetlands/riparian zones. The ecological site is classified as an Upland Shallow Loam (Pinyon – Utah Juniper). As such, vegetation on site consists of upland plants with no riparian obligated species. Therefore, wetlands / riparian zones are not present at the site.	J. Carling	06/21/21
NP	Wild and Scenic Rivers	There are no designated National Wild and Scenic Rivers System (NWSRS) segments, or segments identified in the BENM MMP as “suitable for designation” into the NWSRS system, present in the project area.	S. Sparks	06/17/21
PI	Wilderness/WSA	The project area includes parts of the Mule Canyon Wilderness Study Area. Removal of the existing kiosk and fee tube from the WSA would enhance wilderness character. Construction of a connector trail between the Mule Canyon Developed Site and the House on Fire Trailhead is intended to reduce braiding and social trails forming between these two locations due to increased levels of hiking. These social trails are impacting resources through duplicate trails, impacts to cultural sites, and soil erosion. In order to minimize recreational use impacts to wilderness characteristics a single, properly located, sustainable trail may be provided for under the or "protect or enhance wilderness characteristics or values" exceptions to the non-impairment criteria (see BLM Manual 6330 sections 1.6.C.2.f.)	M. Haines	6/30/21
NI	Woodland / Forestry	The PA area is barren of most trees. There may be removal of some trees bordering the parking area in the clearing the site, but effort would be made to retain these trees if possible for shade and will not represent a significant loss of woodland resources.	M. Wardle	06/15/21
NI	Vegetation Excluding USFW Designated Species	The Proposed Action is on an area that has been disturbed by tourism in the past. There is little vegetation in the area and a detailed analysis is not needed.	N. Noyes	6/24/21
PI	Visual Resources	The construction and installation of the proposed trailhead facilities (delineated parking area, fence, restroom facility, information kiosk, and picnic areas) would add visually contrasting elements to the characteristic landscape, as viewed from SR 95 (Trail of the Ancients Scenic Byway). The degree of permanent visual contrast created by the proposed trailhead and whether it would conform to VRM objectives for the area will be analyzed in detail in the EA. The short-term construction phase is not analyzed in detail because the presence of machinery and equipment would be similar	S. Sparks	6/23/21

Determination	Resource	Rationale for Determination*	Signature	Date
		<p>in degree to the effects of parked cars when the project is completed.</p> <p>The proposed trail connecting the proposed trailhead to the Mule Canyon Developed Site would result in no visual impacts due to the narrow and primitive nature of the trail, vegetative screening, and the presence of existing social trails in the characteristic landscape. The trail would only be visible to users of the trail. This element of the project does not require detailed analysis.</p>		
NP	Areas with Wilderness Characteristics	The project area outside of Mule Canyon WSA was identified as Inventoried lands with no wilderness characteristics in the 2008 BLM Monticello RMP. This finding was carried forward into the 2020 Bears Ears National Monument Record of Decision and Approved Monument Management Plans Indian Creek and Shah Jaa Units.	M. Haines	6/30/21

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/		
Authorized Officer			

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

Date: 06/23/2021

District Office: Canyon Country

Field Office: Monticello

Land Use Planning Area: Bears Ears MMP

SECTION A. PROJECT INFORMATION

1. Project Name House on Fire Trailhead Improvements	4. KOP Location (T.R.S)	5. Location Sketch See attached map and photo
2. Key Observation Point (KOP) Name State Route 95 (Trail of the Ancients Scenic Byway)		
3. VRM Class at Project Location II, w/ REC infrastructure exception of III	(Lat. Long) 37.53680, -109.73561	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	panoramic, sloped and smooth in foreground and middleground, irregular and blocky in background (mesas)	rounded, regular and smooth in middleground and background, irregular in foreground w/ tall rounded and low	natural surface roads - flat, smooth; sign - linear and rectangular; parked vehicles - blocky, irregular, scattered
LINE	generally horizontal foreground and middleground, with some vertical and irregular lines from mesas in background	predominantly broken and indistinct, some vertical lines produced by tree trunks in foreground	natural surface roads - indistinct, broken by vegetation; sign - vertical; parked vehicles - vertical (rvs), complex, irregular
COLOR	tan/brown sand color in foreground, tan sandstone in middleground, and red sandstone in background	dark green pinyon/juniper, light green sage, yellow grasses, gray tree trunks	natural surface roads - tan/brown sandy; sign - natural wood brown; vehicles multiple vibrant contrasting colors
TEXTURE	medium texture due to irregularity and blockiness of mesas in background	medium, patchy (sections of pinyon-juniper w/ open sections of low grasses and shrubs)	natural surface roads - smooth; sign - angular; parked vehicles - medium, blocky, scattered

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Same as B	Same as B	Rectangular and angular kiosk, restroom, and picnic tables; parked vehicles form more condensed less irregular, scattered
LINE	Same as B	Same as B	vertical lines from kiosk, restroom, short vertical and horizontal lines from fence, depending on style, vehicles same as B
COLOR	Slightly more tan/brown sand color and gray gravel from developed parking	Same as B	Environmental colors chosen to match landscape; tans, greens, browns, grays for facilities; Vehicles vibrant, contrasting
TEXTURE	Same as B	Same as B	More blocky elements, but still medium general texture

SECTION D. CONTRAST RATING SHORT TERM LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Explain on reverses side)	
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)					
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE		
ELEMENTS	FORM				✓				✓				✓	3. Additional mitigating measures recommended <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Explain on reverses side)	
	LINE				✓				✓				✓		
	COLOR			✓					✓				✓		
	TEXTURE				✓				✓				✓		
														Evaluator's Names S. Sparks, M. Haines	Date 06/23/2021

(Continued on Page 2)

(Form 8400-4)

SECTION D. (Continued)

Comments from item 2.

Although there is an exception that allows recreation infrastructure to be built according to VRM III objectives in this area, the proposed project would conform to VRM II objectives due to the weakness of visual contrast. The proposed trailhead sits in a pocket below the level of the highway and below the horizon line, and is partially screened by tall pinyon-juniper vegetation along the roadway. Due to the low angle of observation, and vegetative screening, visual contrast produced by the elements of the proposed project would be greatly reduced. In addition, the length of time the proposed trailhead would be in view from the KOP is limited. With vegetative screening, it would be intermittently visible for approximately 0.4 miles or 22 seconds for a westbound traveler, driving at a rate of 65 mph. It would be mostly screened and visible to an eastbound traveler for approximately 0.1 miles or 6 seconds at the same rate of speed. The most visually impacting element would be parked cars. However, cars are already parking at the location and are therefore part of the characteristic landscape. Delineated parking would result in more vehicles on the site, but visual contrast from vehicles would be more confined, regular and sited in the area with the most vegetative screening. Vehicles currently park in a scattered, irregular fashion, and in areas of higher ground, which can create more visual contrast from the KOP.

Additional Mitigating Measures (See item 3)

House on Fire Trailhead Improvements - Visual Contrast Rating Worksheet Attachment

KOP Map:



Photo from KOP (looking NW toward trailhead):



SCOPING COMMENTS

APPENDIX C:

Comment	Topic	Comment	BLM Response
SUWA #1	Loop Trail	Although the loop trail is intended to create a well-defined path that keeps visitors from venturing to cultural sites up-canyon from House on Fire, we are concerned that by connecting the loop trail to the Mule Canyon Interpretive Site, the Proposed Action actually gives visitors a shorter and easier hike to House on Fire... Accordingly, BLM should remove any connector trail from the loop trail to the Mule Canyon Interpretive Site and reclaim any social trails that have developed in the area. This will ensure that visitors to House on Fire use the proposed House on Fire parking area exclusively and will not attempt to shorten their hike and venture farther up-canyon from their intended destination.	The loop trail was removed from the proposal. The connector was retained, but in combination with reclamation of social trails in the area of the loop trail; this should mitigate concerns about visitors shortcutting the trail between the developed site and House on Fire.
SUWA #2	Social Trail	BLM must close and remediate any social trails outside of those approved as part of the Proposed Action. Specifically, BLM must close and restore the social trails crossing from the Mule Canyon Interpretive Site to the rim of Mule Canyon to ensure that the purpose of the Proposed Action—to discourage use beyond the House on Fire site—is realized.	Social trail remediation has been made more explicit in the Proposed Action.
SUWA #3	Signs	BLM should ensure that the Proposed Action includes plenty of markers and signage that encourages visitors to stay on the main trail to House on Fire. This will deter visitors from venturing beyond House on Fire into unmarked, sensitive cultural sites.	Minimal trail markers have been included in the Proposed Action, in conformance with allowable actions within WSAs (see BLM Manual 6330).
SUWA #4	Loop Trail	BLM must consider a reasonable range of alternatives, which includes an alternative that does not create a trail through the WSA yet allows for parking and other amenities development near the current Mule Canyon trailhead. This alternative would eliminate any loop trail as well as a connector trail from the Mule Canyon Interpretive site, and would prioritize managing the existing trail in the bottom of Mule Canyon.	The loop trail was removed from the proposal. The connector was retained, but in combination with reclamation of social trails in the area of the loop trail, this should mitigate the need for an additional alternative.
BB #1	Loop Trail	The proposed trailhead improvements will increase visitor traffic into the upper reaches of both the South and North Forks of Mule Canyon where numerous well-preserved and fragile cliff dwellings are located...these areas are also receiving amplified visitation in recent years in the form of reduced numbers of surface artifacts and an increase in looters pits, vandalization, trails across middens, and collectors piles of surface artifacts in the upper reaches of both canyons. These sites have great significance to understanding the cultural history of the local area and region and need to be protected...I worry that the proposed trail from the existing mesa top Mule Canyon Ruins Interpretative Site and Parking Area to the rim of the Canyon will encourage visitors to continue along the rim of the canyon to the west where they will become aware of the other sites in the canyon	The loop trail was removed from the proposal due to potential conflicts with wildlife and WSA. The constructed rim trail will be oriented east to the preferred trailhead and social trails to the west of the site will be remediated.

SCOPING COMMENTS

Comment	Topic	Comment	BLM Response
		proposed undertakings...Surface sites may also be present along the proposed mesa top trail from the Mule Canyon Interpretative Site and the rim of the canyon and parking areas. These sites should be documented and tested for their significance as they could be obliterated by trampling...Additional site documentation and tree-ring sampling research should be conducted at sites in the immediate vicinity of the project and in the larger Mule Canyon area to mitigate the effects of the increased impacts to the sites in the areas that are likely to occur as the result of this project.	
BB #2	Signage	If the project proceeds, I suggest revising the interpretative signage throughout the proposed project area to reflect recent archaeological and ethnographic understandings of not just the individual sites but the surrounding cultural landscapes.	Enhanced signage has been added to the project proposal.
BB #3	Consultation	The descendant communities and other stakeholder groups who are associated and affiliated with the Bears Ears area should also be consulted about the project and their input about the sites (and larger area) should be incorporated into the goals and outcomes of the project.	Consultation with Native American Tribes is ongoing.
FCM #1	Loop Trail	The loop trail component is absolutely critical to making this project one that will benefit –and not unintentionally harm –the cultural resources of South Mule Canyon...a project that does not actively seek to minimize up-canyon traffic likely will have the consequence of further exacerbating existing threats to these more sensitive resources...research indicates that giving visitors the carrot of a nice loop back to their car, which will include plentiful scenic views from the rim, is an excellent strategy to minimize up-canyon traffic.	The loop trail was removed from the proposal due to potential conflicts with wildlife and WSA. This decision could be revisited in the future if efforts to close social trails in the area of the loop trail prove unsuccessful. In that case, a separate analysis would be needed.
FCM# 2	Signage	Multiple social trails have developed from the parking area heading down to House on Fire. These trails are damaging cultural resources, causing erosion, and are potential dangerous. The creation of a well-built trail into the canyon should largely address these issues. However, one consequence of a spur that connects to the loop trail is that it could facilitate visitors spending even less time to get to House on Fire and potentially the sites up canyon...Signage and directional information given out at visitor centers should direct people to park at the new parking area to access House on Fire. We would also suggest that the beginning of this spur trail not be marked with directional signage for House on Fire. And, signage at the canyon bottom should once again point to the loop (this time going out of the canyon) as the natural path for people to take.	The loop trail was removed from the proposal due to potential conflicts with wildlife and WSA, making this comment moot at this time.
FCM#3	Signage	We encourage BLM to plan for interesting interpretive signage along the rim trail, as well as nice stopping places for resting and photography... Designing the trail to wander a bit and hit the best vistas along the rim will also be important (of course while avoiding the cultural sites on the mesa top).	Enhanced signage has been added to the project proposal.

SCOPING COMMENTS

Comment	Topic	Comment	BLM Response
FCM #4	Signage	Some minimal signage [at the site] should be considered. This signage could encourage people not to enter or touch the structures. At trailheads and parking areas, however, is the perfect location for more extensive educational and interpretive signage that will help visitors understand and appreciate what they are seeing, while learning Visit with Respect principles...Obviously, interpretive materials need to be developed in partnership with indigenous Tribes.	Enhanced signage has been added to the project proposal. Consultation with Native American Tribes is ongoing.
FCM #5	Toilet/ Picnic Tables	A toilet at the trailhead will benefit users in this entire area, including visitors to Cave Towers, Arch Canyon, Texas Flat and other adjoining areas...Likewise, the picnic facilities will encourage visitors to spend time in an area with appropriate facilities and ideally getting a little education on the area while lingering.	No Response.
JB	Consul- tation	These resources need protection and need monitoring. Consultations with local Native American Tribes is important as well.	Consultation with Native American Tribes is ongoing.
JN		I would like to make an additional proposal for this area that could be addressed while improving this area. There is a large clear and flat area that runs directly between the dirt road and highway 95 just after the fee booth. I am requesting that we put a small OHV trail across this and along the fence to a gate or fence ramp (that would need constructed) that is directly across from the gate that accesses the popular cliff house ruins on the SITLA section across the highway.	This proposal is outside of the scope of the purpose and need for this project.
JL	General Dis- agreement	Improvements at House on Fire will only draw the “park, snap and go” hordes to the site. It will be overrun. If you keep it low-key, only the adventurous will continue to make the trek.	Regional visitation trends and comparison with visitation patterns at similarly-situated nearby tourist attractions suggest that the increased visitation at House on Fire driven by a combination of increased media surrounding the BENM designation and social media exposure, enhanced by successful State and County advertising campaigns, rather than the presence or absence of on-site infrastructure.
MJ	General Agreement	I was a visitor to this site in May of 2019 the improvements will be good for the area. please move forward with this plan. This a good example of federal funding well spent.	No Response.
RM	OHV Trail	I support the proposed trail improvements to Mule Canyon and House on Fire, and the improved parking area. These improvements not only accommodate visitors safety and enjoyment of the area, but also show respect for these cultural and scenic resources, and	No Response.

SCOPING COMMENTS

Comment	Topic	Comment	BLM Response
		demonstrate a serious government presence which encourages respectful visitation, and discourages abuse of the area. We traveled thru this area last year but missed this trailhead; I look forward to returning and enjoying the new loop trail.	
TLY	Signage	A narration panel that addressed topics such as: Visit With Respect, the light conditions that gives the site name, past uses of the enclosures, the different styles of wall construction, and proximity to Mule Canyon Kiva, would be a significant enhancement	Enhanced signage has been added to the project proposal.